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**Report to the Federal Communications Commission on Carrier Efforts Toward Attaining Digital TTY Accessibility, and the Status of the Various Technological Solutions, as Provided by CC Docket No. 94-102, In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems**

Public Service Cellular, Inc. ("Public Service") and Enterprise Wireless PCS, L.L.C. ("Enterprise") (together "the Companies"), by their attorneys, pursuant to the Federal Communications Commission's ("Commission") *Fourth Report and Order* in CC Docket No. 94-102,<sup>1/</sup> and the subsequent *Order* in the same proceeding,<sup>2/</sup> hereby file a Quarterly Report for the quarter ending September 30, 2002, detailing their efforts towards attaining digital TTY accessibility, and the status of the various technological solutions that will help them attain that goal. Public Service provides switching services for Enterprise and is also the Network Operating member of the L.L.C.

In its *Fourth Report and Order* the Commission established December 31, 2001 as the new deadline for carriers operating digital wireless systems to have obtained all software upgrades and equipment necessary to make their systems capable of transmitting 911 calls from TTY devices. It further established June 30, 2002 as the deadline for carriers to integrate, test and deploy the technology in their systems in conjunction with the public safety community.<sup>3/</sup> In order to be assured that the aforementioned deadlines would be met without complication, the Commission required digital wireless carriers to submit Quarterly Reports fifteen days after the end of each quarter.<sup>4/</sup> Public Service and Enterprise have kept the Commission informed as to their progress in achieving TTY-compatibility and, due to transitioning to new digital technologies, the Companies requested waiver of these deadlines until December 31, 2003. In its recently released *Order* in this proceeding, the Commission granted Public Service's and Enterprise's requests for waiver, while requiring the Companies to continue to submit Quarterly Reports.<sup>5/</sup> Public Service and Enterprise now file this instant report with the Commission.

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<sup>1/</sup> In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Fourth Report and Order*, CC Docket No. 94-102, 15 FCC Rcd 25216, 65 Fed. Reg. 82293 (December 28, 2000), ("*Fourth Report and Order*").

<sup>2/</sup> In the Matter of Revision of the Commission's Rules To Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, 17 FCC Rcd 12084, (rel. June 28, 2002) ("*Order*"). (granting separately Public Service's and Enterprise's request for waiver of the rule until December 31, 2003).

<sup>3/</sup> 47 C.F.R. § 20.18(c).

<sup>4/</sup> See, *Fourth Report and Order* (December 28, 2001).

<sup>5/</sup> See, *Order* (rel. June 28, 2002).

## **I. Carrier Background**

Public Service provides analog and digital CMRS wireless service in the Columbus, GA/AL MSA; Georgia 6 – Spalding; Alabama 5 – Cleburne; Alabama 8 – Lee; Georgia 5 – Haralson; and Georgia 9 – Marion RSAs; and the Anderson, SC; Anniston, AL; and Columbus, GA BTAs.<sup>6/</sup> Enterprise provides broadband Personal Communications Service (“PCS”) in the B115 – Dothan, AL; B334 – Opelika, AL; B006 – Albany, GA; and B237 – LaGrange, GA BTAs.<sup>7/</sup> As acknowledged by the Commission in its grant of both Public Service’s and Enterprise’s requests for waiver, compliance with the Commission’s June 30, 2002 deadline was impractical.

## **II. Access to 911 Through TTY Devices**

### **A. Development Activities**

During the third quarter, the Companies continued to investigate alternate digital technologies for deployment by December 31, 2003.

Public Service and Enterprise also contacted the Commission’s Consumer & Governmental Affairs Bureau, to help “ensure that [the Companies’] subscribers are informed of the waiver until December 31, 2003.”<sup>8/</sup> The Companies contacted the Bureau per the Commission’s suggestion made to all carriers receiving waivers, despite the fact that they are not aware of any existing customer that uses a TTY device on either of their networks, or expressed a desire to utilize such devices on either the analog or digital network. Public Service and Enterprise were included on the Commission’s list of carriers who received waiver from 47 C.F.R. 20.18(c), posted on the Consumer & Governmental Affairs Bureau’s website.<sup>9/</sup>

### **B. Testing and Deployment Activities**

No testing or deployment activities were undertaken during the third quarter.

## **III. Conclusion**

Public Service and Enterprise have each been granted a waiver of the Commission’s June 30, 2002 deadline for compliance with 47 C.F.R. 20.18(c), until December 31, 2003. Because of the announced abandonment of TDMA by the Companies’ roaming partners, the Companies are

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<sup>6/</sup> Stations KNKA415 (CMA153B), KNKN872 (CMA376B1), KNKN913 (CMA376B2), KNKN883 (CMA376B3), KNKN687 (CMA311B2), KNKN932 (CMA314B2), KNKN934 (CMA375B2), KNKN976 (CMA379B1), KNLG210 (BTA016F), KNLH422 (BTA017D), and KNLH421 (BTA092F).

<sup>7/</sup> Stations KNLF545 (BTA115), KNLF546 (BTAB334), KNLF547 (BTA237) KNLF548 (BTAB006).

<sup>8/</sup> See, Order, at ¶ 25.

<sup>9/</sup> See, <http://www.fcc.gov/cgb/dro/e911tty.html> (last visited September 30, 2002).

preparing to migrate their networks to an alternate digital technology that will not only meet the TTY-compatibility requirements but will also be capable of meeting the other FCC-mandated capabilities. When the Companies make their migration to a new digital technology, that technology will be deployed in a mode fully compatible with TTY devices. As required, under the Commission's recent *Order*, the Companies will provide the Commission with quarterly updates on the status of development and deployment, as advised by their infrastructure and handset vendors.

Respectfully Submitted,  
Public Service Cellular, Inc.  
Enterprise Wireless PCS, L.L.C.

Dated: October 11, 2002

/s/ Anna E. Ward  
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CERTIFICATE OF SERVICE

I, Ruth E. Garavalia, a secretary with the law firm of Kurtis & Associates, P.C., do hereby certify that I have this 11<sup>th</sup> day of October 2002, filed the foregoing “REPORT TO THE FEDERAL COMMUNICATIONS COMMISSION ON CARRIER EFFORTS TOWARD ATTAINING DIGITAL TTY ACCESSIBILITY, AND THE STATUS OF THE VARIOUS TECHNOLOGICAL SOLUTIONS, AS PROVIDED BY CC DOCKET NO. 94-102, IN THE MATTER OF REVISION OF THE COMMISSION’S RULES TO ENSURE COMPATIBILITY WITH ENHANCED 911 EMERGENCY CALLING SYSTEMS” electronically with the Federal Communications Commission’s Electronic Comment Filing System. I have also filed a copy of this report with the Federal Communications Commission’s copy contractor, Qualex International. In addition, a copy of this report has been provided to Melinda Littell of the Commission’s Wireless Telecommunications Bureau.

/s/ Ruth E. Garavalia  
Ruth E. Garavalia